

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

THE COMMONWEALTH OF PUERTO
RICO, et al.,

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS
(Jointly Administered)

MOTION REQUESTING COURT ORDER

To the Honorable United States District Judge Laura Taylor Swain:

Comes now Creditor, R&D Master Enterprises, Inc., by and through the undersigned attorney, who respectfully requests and prays as follows:

1. Pending before this Honorable Court is a motion to disqualify the law firm of O'Neill & Borges for unresolvable conflict of interest (See ECF 23285).
2. O'Neill & Borges have already submitted before the Court their response, and the movant has also submitted a reply.
3. On February 23, 2023, Congressmen Nydia M. Velázquez, and Raúl M. Grijalva sent

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17- BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17- BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations.)

a letter to the Executive Office for the United States Trustee raising the concern that the Law Firm of O'Neill & Borges may have severe conflicting interests. As such, Congress requests for the office for the US Trustee to fully investigate any professional serving the Financial Oversight Board who have knowingly concealed or intentionally failed to disclose their conflict of interest, or who have acted as interested persons at any time during their employment as professionals in the PROMESA process. (See Exhibit)

4. Consequently, the movant respectfully requests the Court issue Order wherein the US Trustee Office is hereby to inform the result of any investigation as per requested by US Congress, in the alternative, if no investigation has been conducted, an Order should be entered wherein the US Trustee Office is to hereby investigate the Law Firm of O'Neill & Borges for conflicting interest.

WHEREFORE, the Movant hereby respectfully petitions the Court to issue order wherein the US Trustees Office if to report the Court of any conflict of interest regarding the Law Firm of O'Neill & Borges.

RESPECTFULLY SUBMITTED.

In San Juan, PR this 28th day of February 2023.

It is hereby certified that the foregoing motion was filed with the Clerk of the Court and notified to the parties, via the CM/ECF system of the Court.

S/Javier A Rivera-Vaquer
USDC-PR No. 225809

JOSE A RIVERA-CORDERO
JAVIER A RIVERA-VAQUER
PO BOX 192376
SAN JUAN, PR 00919-2376
TEL (787) 759-3634
EMAIL: jariva@rimerico.com